

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:25-cv-22896-KMW

FRIENDS OF THE EVERGLADES, INC., a Florida
not-for-profit corporation, and CENTER FOR
BIOLOGICAL DIVERSITY, a 501(c)(3) nonprofit
organization,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as Secretary
of the UNITED STATES DEPARTMENT OF
HOMELAND SECURITY; TODD LYONS, in his
official capacity as Acting Director of the UNITED
STATES IMMIGRATION AND CUSTOMS
ENFORCEMENT; KEVIN GUTHRIE, in his official
capacity as Executive Director of the Florida Division
of Emergency Management; and MIAMI-DADE
COUNTY, a political subdivision of the State of
Florida,

Defendants.

and

THE MICCOSUKEE TRIBE OF INDIANS,

Intervenor/Plaintiff.

PRESIDING JUDGE:

Hon. Katheleen M. Williams

COURT REPORTER:

Patricia Diaz

HEARING DATES:

July 30, 2025 (Venue)

August 6, 2025

August 7, 2025

August 12, 2025

August 13, 2025 (closing)

**PLAINTIFFS' AND INTERVERNOR/PLAINTIFF'S
FINAL LIST OF ADMITTED EXHIBITS**

Plaintiffs and Intervenor/Plaintiffs hereby submit the final list of admitted exhibits. This list has been provided to counsel for Defendants prior to filing and counsel for Defendants do not contest its accuracy.

PLAINTIFF'S ADMITTED EXHIBITS	
Pl Ex 1	DE 5-1 Declaration of Eve Samples
Pl Ex 2	DE 5-2 Declaration of Tierra Curry
Pl Ex 3	DE 5-3 Declaration of Amber Crooks
Pl Ex 4	DE 16-1 Declaration of Keith Pruett
Pl Ex 5	DE 21-1 Declaration of Thomas P. Giles
Pl Ex 6	DE 21-2 Declaration of David Richardson
Pl Ex 7	DE 24-1 Florida Immigration Enforcement Operations Plan
Pl Ex 9	DE 24-3 Memorandum of Agreement between DHS and FNG
Pl Ex 10	DE 24-4 Declaration of Betty Osceola
Pl Ex 11	DE 24-5 Declaration of Ra Schooley and Laura Reynolds
Pl Ex 13	DE 26-1 Declaration of Ralph Arwood
Pl Ex 14	DE 27-1 Declaration of Christopher W. McVoy, Ph.D
Pl Ex 18	DE 49-1 Declaration of Christopher W. McVoy, Ph.D.
Pl Ex 19	DE 34-1 Declaration of Dr. Anna V. Eskamani ¹
Pl Ex 22	DE 38-4 Brief Analysis Assertion Pre-Existing Cement Pad Underlying Newly Asphalted Jetport Site
Pl Ex 23	Christopher W. McVoy - CV
Pl Ex 24	DE 38-5 (Appendix C) TDF Waste Management Plan Overview
Pl Ex 25	DE 38-6 (Appendix D) Randy S. Kautz Panther Report
Pl Ex 26	DE 38-7 (Appendix E) Randy S. Kautz CV
Pl Ex 31	DE 50-1 Declaration of Ian Gadea-Guidicelli
Pl Ex 33	TNT OPERATIONS DATA FROM 1-1-2020 - 12-31-2024 (ARRIVALS & DEPART)
Pl Ex 34	WERP map
Pl Ex 39	Dillon Reio Resume
Pl Ex 43	South Florida Detention Facility Continuity of Operations (Alligator Alcatraz hurricane plan)
Pl Ex 44	Declaration of Miranda Daviduk
Pl Ex 45	Kristi Noem Sends Direct Message to Illegal Immigrants
Pl Ex 47	2025.06.23_DLC FDEM Letter Response Final
Pl Ex 48	2025.07.07_DLC Letter to AG for Oversight & Compliance
Pl Ex 49	2025.07.10 Letter to FL DEM for Oversight & Compliance
Pl Ex 51	FDEM DLC - LOI to Utilize TNT
Pl Ex 52	Letter of Intent to Purchase TNT
Pl Ex 53	photo construction vehicles at TNT
Pl Ex 54	photo construction vehicles at TNT
Pl Ex 55	photo construction vehicles at TNT
Pl Ex 56	photo construction vehicles at TNT
Pl Ex 58	2025.07.25 - DE 61-2 Req for Immediate Access & Oversight Authority – Training & Transition Site
Pl Ex 59	Video clip of DHS vehicles at TNT site

¹ Per 8/6/25 hr'g tr. at 117:14-118:11, the Court admitted PX 19 but excised paragraph 12.

PI Ex 60	Todd Lyons CBS Face the Nation (admitted by reference through the admission of Pls Ex 144 – Declaration of Cooper Cass)
PI Ex 61	Garrett Ripia ICE Field director (admitted by reference through the admission of Pls Ex 144 – Declaration of Cooper Cass)
PI Ex 63	Kristi Noem press conference (admitted by reference through the admission of Pls Ex 144 – Declaration of Cooper Cass)
PI Ex 64	Kristi Noem Fox News (admitted by reference through the admission of Pls Ex 144 – Declaration of Cooper Cass)
PI Ex 65	Vehicles and trucks at TNT site
PI Ex 79	Expert Disclosure Report - Dillon N. Reio, P.G.
PI Ex 81	RA - July 18, 2025, Video KTNT 07-18-2025 01
PI Ex 82	Analysis of New Paving at the Dade Collier TNT Airport - McVoy
PI Ex 83	Dade-Collier Airport (Jetport) in Context of WERP
PI Ex 85	Tour of Detention Center - McVoy – 6-28-2025
PI Ex 87	DE 80-1 Declaration of Curt Bradley
PI Ex 88	Map of Big Cypress Wildlife Management Area (4 Hunt map units)
PI Ex 89	Soil Profile - Dade Collier Training
PI Ex 90	2025.06.30 TNT Dade-Collier Airport - Full Civil Updated Set
PI Ex 91	2025.07.07 TNT Dade-Collier Airport - Full Civil Set
PI Ex 92	2025.07.08 – Rev - TNT Dade-Collier Airport - Full Civil Set
PI Ex 93	050713-17 - ComplianceEngHistory 658820
PI Ex 94	080428-16 - Exhibits 432584
PI Ex 98	Draft-COOP-Redacted (Fla State of Emergency Response Team (SERT) - So Fla Detention Facility Continuity of Operations Plan)
PI Ex 99	Resume of Mike Radford, PE (SEC Engineers, Dillon Reio’s colleague)
PI Ex 100	MDC-Aviation Dept-Operational Directive No 15-02 (effec 06.02.15) Dade-Collier Training & Transition Airport
PI Ex 101	Noem image – “over 10 miles of Everglades on all sides of facility”
PI Ex 102	GovRonDesantis X post “Operations at [the Facility] are ongoing and deportations continuing”
PI Ex 103	Photographs of new fencing on access road
PI Ex 104	August 7, 2025 Statement of Miami-Dade County Mayor Daniella Levine Cava
PI Ex 105	PC deportation flights from Florida’s ‘Alligator Alcatraz
PI Ex 106	Stephen Miller, White House Fox News interview
PI Ex 107	SERT Order No. PO-010162 (\$1,180,000) IRG Global EM
PI Ex 108	SERT Order No. PO-010177 (\$325,800) Innovative EM
PI Ex 109	PO-010174 (\$380,000) AC Disaster
PI Ex 110	SERT Order No. PO-010181 (\$25,594) Trulight LLC
PI Ex 111	SERT Order No. PO-010182 (\$15,699.35) CDW Government
PI Ex 112	SERT Order No. PO-010183 (\$3,358,700) Granny’s Alliance
PI Ex 113	SERT Order No. PO-010201 (\$24,740) WeatherSTEM Inc.
PI Ex 114	SERT Order No. PO-010199 (\$848,420.22) Public Safety Solutions
PI Ex 115	SERT Order No. PO-010200 (\$47,730) Williams Communications
PI Ex 116	SERT Order No. PO-010198 (\$52,010) Lemoine CDE Logistics
PI Ex 117	SERT Order No. PO-010197 (\$18,178,796.27) Lemoine CDE Logistics

PI Ex 118	SERT Order No. PO-010195 (\$2,905,740) TNT Transportation
PI Ex 119	SERT Order No. PO-010196 (\$2,248,540) IRG Global Emergency
PI Ex 120	SERT Order No. PO-010307 (\$259,012) Will-Burt Integration & Elevation
PI Ex 121	SERT Order No. PO-010306 (\$499,869.60) Baker's Communications
PI Ex 122	SERT Order No. PO-010305 (\$245,141.04) Williams Communications
PI Ex 123	SERT Order No. PO-010304 (\$27,865) Motorola Solutions, Inc.
PI Ex 124	SERT Order No. PO-010303 (\$2,192) Motorola Solutions, Inc.
PI Ex 125	SERT Order No. PO-010302 (\$128,132.40) CDW Government LLC
PI Ex 126	SERT Order No. PO-010326 (\$36,848,875) LTS, Inc.
PI Ex 127	Photo of black temporary silt fencing 2025-07-25
PI Ex 128	FDHSMV Kerner Facebook Post, April 9, 2025
PI Ex 129	Miami Herald , <i>Exclusive: Hundreds at Alligator Alcatraz Have No Criminal Charges, Miami Herald Learns</i>
PI Ex 130	Miami Herald, <i>Is your family member or client at Alligator Alcatraz?</i>
PI Ex 131	Outside Everglades Detention Center by Carrie Feit Portraits
PI Ex 132	Carrie Feit Declaration
PI Ex 133	LinkedIn page for Ian-Paul Gadea-Guidicelli, MPA, CEM, FPEM
PI Ex 134	Homeland Security "Final Notice and Public Explanation of a Proposed Activity in a 100-Year Floodplain – Dormitory Construction at Immigration and Customs Enforcement Krome Service Processing Center – Miami, Florida
PI Ex 135	Texts from Israel O. Herrera, ICE Assistant Field Officer to FDEM re Standards and Compliance Tour Scheduling.
PI Ex 136	Ralph Arwood - 08-08-2025 KTNT 06
PI Ex 137	Ralph Arwood - 08-08-2025 KTNT 15
PI Ex 138	Ralph Arwood -08-08-2025 KTNT 17
PI Ex 139	Ralph Arwood - 08-08-2025 KTNT 82
PI Ex 140	Ralph Arwood - 08-08-2025 KTNT 76
PI Ex 141	Ralph Arwood - 08-08-2025 KTNT 79
PI Ex 142	Ralph Arwood - 08-08-2025 KTNT 09
PI Ex 143	08.08.2025 Brian Mast letter to Jessica Namath
PI Ex 144	08.08.2025 Declaration of Cooper Kass
PI Ex 145	Ralph Arwood - 08-08-2025 KTNT (Video)
PI Ex 146	2025.08.05 Declaration of Joseph Kinnebrew
PI Ex 147	FDEP - Florida Panther Consultation Area Florida Department of Environmental Protection Geospatial Open Data
PI Ex 148	2019 ICE OIG Report
PI Ex 149	2025 State Immigration Council Agenda
PI Ex 150	A look at Florida's immigration arrest numbers in 2025 _ WUSF
PI Ex 151	Baker County IGSA
PI Ex 152	DOC Addendum ACLU Case
PI Ex 153	Final Environmental Assessment for the Proposed Contract Detention Facility in the Houston, Texas Area of Operations
PI Ex 154	Final Notice and Public Explanation of a Proposed Activity - Krome _ Homeland Security
PI Ex 155	Glades IGSA
PI Ex 156	Matt Luchins Declaration

PI Ex 157	Venezuelan influencer Luis Frio faints in Alligator Alcatraz – NBC 6 South Florida
PI Ex 158	2025.08.11 Declaration of Miranda Daviduk
PLAINTIFF’S INTERVENOR (THE MICCOSUKEE TRIBE) ADMITTED EXHIBITS	
Ex 1	Declaration of Kevin Donaldson
Ex 2	Declaration of Amy Castaneda ²
Ex 4	Declaration of Jason Daniel
Ex 5	Declaration of Melany Flint
Ex 6	Tribe Villages Map
Ex 7	Tribal Sites
Ex 8	Water Flow Map
Ex 9	Light Report
Ex 10	Big Cypress National Preserve Backcountry Access Plan (subject to confirmation in transcript)
Ex 12	The White House, President Trump Arrives Dade-Collier Training and Transitional Airport 7-1-25
Ex 13	The White House, President Trump Participates in a Guided Walking Tour of Alligator Alcatraz Part 1. 7-1-25 (subject to confirmation in transcript)
Ex 14	The White House, President Trump Participates in a Guided Walking Tour of Alligator Alcatraz Part 2. 7-1-25 (subject to confirmation in transcript)
Ex 15	Fox 5 Atlanta, President Trump visits Alligator Alcatraz ICE detention center in Florida 7-1-25
Ex 19	Comprehensive Everglades Restoration Plan - Western Everglades Restoration Project
Ex 20	Collier County Right of Way, Sign & Well Permit Application Status
Ex 21	DHS Instruction Manual 023-01-001-01 - Implementation of NEPA
Ex 22	Appendix C, part 1, Comprehensive Everglades Restoration Plan, Western Everglades Restoration Project (Pages 209-211, 213-215, 216-219)
Ex 23	Appendix C, part 2, Comprehensive Everglades Restoration Plan, Western Everglades Restoration Project (Pages 193-194)

Dated: August 15, 2025

Respectfully submitted,

² This declaration was provisionally admitted.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 15, 2025, I electronically filed the foregoing with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the Service List below via transmission of Notice of Electronic Filing generated by CM/ECF.

s/ Paul J. Schwiep

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